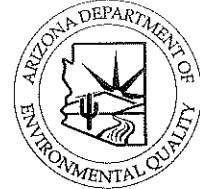




Janet Napolitano  
Governor

# ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Stephen A. Owens  
Director

AQD:PS:CTS: 117762

**Certified Mail  
Return Receipt Requested**

**November 21, 2005**

Deborah Jordan, Director  
Air Division  
U.S. EPA Region IX  
75 Hawthorne St.  
San Francisco, CA 94105

Subject: Clarification on Commitments made by ADEQ for SRP Coronado Air Quality Permit  
Number 30732

Dear Ms. Jordan:

The purpose of this letter is to clarify the commitments made by the Arizona Department of Environmental Quality (ADEQ), to the U.S. EPA Region IX in the Commitment Letter sent out on September 14, 2005. Representatives of both agencies have discussed and agreed in a teleconference meeting on November 9, 2005, that all changes stated in the Commitment Letter shall be made, except for the comment requesting ADEQ to "revise Permit Condition I.E to state that if any emissions are observed during visible emissions observations, a Method 9 reading will be conducted."

After further review, the Department has determined that the above requirement would constitute a significant burden to the Permittee without a commensurate benefit to the environment. The baghouses inherently will have a certain amount of visible emission. If the visible emissions are near the opacity limit, this indicates that the baghouse is not operating properly and corrective action would be taken. ADEQ based this determination upon the fact that the emissions units in question are only subject to the process weight rate equation for overall PM emissions. Since the PTE of this equipment is less than the allowable emissions, ADEQ has concluded that a weekly observation to determine whether the opacity appears to exceed the applicable limit on an instantaneous basis, and if so then conduct a full Method 9 observation, is sufficient.

Should you have any questions or concerns, please contact Eric Massey, at (602)771-2288 or me at (602)771-2308.

Sincerely,

Nancy C. Wrona, Director  
Air Quality Division

NCW:mbh

cc: Eric Massey, Air Quality Permits Section  
Gerardo Rios, EPA Region IX

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